

Dear Commissioners,

My name is Mark Uhde and I am writing as an interested member of the public to urge you to deny the proposed rulemaking in 13-213. Globalstar seeks to create a monopoly for use of spectrum that is license-free in the rest of the world. Currently, IEEE 802.11 (WiFi) channels 12 and 13 are not permitted in the United States due to risk of interference with Globalstar's licensed spectrum. Channel 13 ranges from 2462-2482 MHz, fully within the license-free range, but due to strict emissions guidelines, is not generally permitted stateside.

Currently, most users of WiFi in the US use channels 1, 6, and 11 as non-overlapping channels, however for all modes except 802.11b, channels 1, 5, 9, and 13 are also non-overlapping. Such a channel plan allows a 33% increase in capacity in the 2.4 GHz band - capacity which is critical with demand on public WiFi networks at an all-time high.

Globalstar wants to take us backwards and actually deprive the people of the United States of channels 12 and 13 by creating an exclusive right to use Channel 14 (permitted for 802.11b operation only, and only in Japan) for themselves, without compensating the American public. What's next? Requesting the same guard space they have today and prohibiting use of channels 10 and 11? Not that it would matter too much since we'd still have 1, 5, 9 as a three-channel non-overlapping space; but the principle is that we should not be giving away valuable spectrum resources without compensation. Ask AT&T or Verizon what they would be willing to pay for 20 MHz of 2.4 GHz spectrum nationwide. Then ask yourselves why this should be given to Globalstar free of charge.

Instead of the proposal at hand, I urge the FCC to reduce protections on Globalstar's licensed spectrum so that use of WiFi channels 12 and 13 is permitted in the United States. Operations on these channels have created no newsworthy ill effects on Globalstar elsewhere in the world, and would be highly in the public interest.

Thank you for your time and attention to this important matter.

Sincerely,

Mark Uhde